



STATE OF NEVADA  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
Colleen Cripps, Ph.D., Administrator

November 7, 2014

Michael Rojo  
Environmental Services, Supervisor  
NV Energy  
PO Box 279, MS 77  
501 Wally Kay Drive  
Moapa, NV 89025

Re: **NV Energy (NVE)**  
**Reid Gardner Station (RGS)**  
**NDEP Facility ID #H-000530**  
Nevada Division of Environmental Protection (NDEP) Comments on:  
*Draft Background Conditions Report*, Dated: July 2014

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's *Draft Background Conditions Report*, received by NDEP on August 5, 2014. The subject report summarizes the background soil and groundwater investigations, aquifer testing, and proposes background soil and groundwater concentrations. This report includes revisions to the October 2013 Draft Backgrounds Conditions Report and a *Document and Response to Comments Tracking Form*. The NDEP reviewed the changes made to the October 2013 draft, as presented in the July 2014 draft and has a couple of comments to the comment responses. Additional comments from NDEP are included in Attachment A. The NDEP concurs with the 2014 Draft Background Conditions Report. The attached comments do not require the Draft Background Conditions Report to be changed.

Please contact the undersigned with any questions or comments about this letter at (775) 687-9396 or [aoakley@ndep.nv.gov](mailto:aoakley@ndep.nv.gov)

Sincerely,

Alison Oakley, CEM  
Environmental Scientist III  
Bureau of Corrective Actions  
NDEP-Carson City Office



Mike Rojo  
NV Energy, Reid Gardner Station  
November 7, 2014  
Page 2 of 3

cc: Jeff Collins, Bureau of Corrective Actions, NDEP  
Scott Smale, Bureau of Corrective Actions, NDEP  
Todd Croft, Bureau of Corrective Actions, NDEP Las Vegas  
Bill Campbell, Tribal Liaison, NDEP  
Alan Tiney, Bureau of Water Pollution Control, NDEP  
Ebrahim Juma, Clean Water Team  
Joe Leedy, Clean Water Team  
Dennis Campbell, Southern Nevada Health District (campbell@snhdmail.org)  
Lynn M. Cintron, Sr. Administrative Assistant, Solid Waste & Compliance, SNHD, (cintron@snhdmail.org)  
Brian Northam, Envi. Health, Solid Waste & Compliance, SNHD (northam@snhdmail.org)  
Starla Lacy, NV Energy (SLacy@nvenergy.com)  
Darren Patten, NV Energy (DPatten@nvenergy.com)  
Tony Garcia, NV Energy (TGarcia@nvenergy.com)  
Michael Rojo, NV Energy (MRojo@nvenergy.com)  
Jason Reed, NV Energy (JReed@nvenergy.com)  
Becky Svatos, Stanley Consultants, Inc., (SvatosBecky@stanleygroup.com)  
William Carrig, Stanley Consultants, Inc., (CarrigBill@stanleygroup.com)  
John Kivett, Arcadis, (John.Kivett@arcadis-us.com)  
Brad Cross, Arcadis, (Brad.Cross@arcadis-us.com)

cc: William Anderson, Moapa Band of Paiutes, Chairperson, P.O. Box 340, Moapa, NV 89025  
Ian Zabarte, Moapa Band of Paiutes, Environmental Director, P.O. Box 340, Moapa, NV 89025  
Noelle Gentilli, Department of Water Resources, 1416 9<sup>th</sup> Street, Room 1118, Sacramento CA 95814

## **Appendix A**

All comments below are regarding the Document and Response to Comments Tracking Form for the Draft Background Conditions Report, Administrative Order on Consent Activities, NV Energy Reid Gardner Station, dated July 31, 2014.

1. NVE's response to Comment #6 regarding IMW-2.5S does not satisfy fully NDEP's concerns regarding that well's use as a representative background well. The NDEP notes that the text of the report was changed to reflect that alluvial groundwater proposed background threshold values will not be used for remedial decision making purposes. However, the comment response states that NV Energy believes that the totality of the data indicates that IMW-2.5S is an appropriate alluvial background well. The response does not explain why total dissolved solid (TDS) concentrations spike and drop over very short periods of time at that well, or why TDS and other constituents periodically occur at higher concentrations than any other background well. If NVE's analysis can provide a plausible explanation regarding the unique conditions observed at that well, NDEP would like to see that analysis in its entirety. At this point, the NDEP will agree to disagree with NVE's supposition until the comprehensive conceptual site model is completed for the site.
2. Comment #8 refers to connectivity between the alluvial aquifer and the Muddy River. The NDEP's position is still that conclusions presented regarding the connectivity of the Alluvial and Muddy Creek Aquifers or the Alluvial Aquifer and the Muddy River based on pumping test results are tenuous at best and will require additional testing for verification. In unconfined aquifers, aquifer pore space is physically drained during extraction (the specific yield). A volumetric analysis of the unconfined alluvial aquifer that would be drained based on the total volume of water extracted (using reasonable effective porosity and thickness assumptions) may provide some insight into the potential radius of influence that may have existed at the end of the referenced test.